

REMARKS

Claims 1-61 are pending in the application. Claims 1-61 were rejected. Claims 1, 12, 22, 31, 41 and 52 are currently amended.

Applicants respectfully respond to this Office Action.

Claim Rejections under 35 U.S.C. § 101

Claims 1-11 and 22-51 were rejected under 35 U.S.C 101 as being directed to non-statutory subject matter. Note paragraphs [1029] and [1031] as cited on page 2 of the office action state disclosed embodiments of Applicants invention "may be implemented as electronic hardware, computer software, or combinations of both." Paragraph [1011] of Applicants' specification also states "[a] mobile station or user equipment (UE) may be a mobile telephone which includes a mobile telephone handset, also called mobile equipment (ME), and a **memory module, such as a physically secure integrated circuit card or smart card called UICC**, which may be removable or permanently attached to the ME." Applicants respectfully request the rejection of claims 22, 33 and their dependent claims be withdrawn.

Claims 1, 22, 31 and 52 have been amended to recite "authenticating at least one registration message in the MBMS based on the RGK." Applicants respectfully request the rejection of claims 1-11, 22-29 and 41-51 and their dependent claims be withdrawn.

Claim Rejections under 35 U.S.C. § 102(e)

Claims 1-61 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,879,690B1 to Faccin et al. (hereinafter "Faccin").

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." M.P.E.P. § 2131 (Aug. 2001) (*quoting Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). "The identical invention must be shown in as complete detail as is contained in the . . . claim." *Id.* (*quoting Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9

USPQ2d 1051, 1053 (Fed. Cir. 1987)). In addition, “the reference must be enabling and describe the applicant’s invention sufficiently to have placed it in possession of a person of ordinary skill in the field of the invention.” *In re Paulsen*, 30 F.3d 1475, 1479, 31 USPQ2d 1671, 1673 (Fed. Cir. 1994)

Applicants respectfully submit that claims 1-61 are not anticipated by Faccin et al. for the reasons and explanations set forth below.

With respect to claim 1, Applicants respectfully submit that Faccin does not disclose all of the limitations of claim 1. In particular, Faccin does not disclose “generating a temporary registration key (RGK) as a function of the RAK.” The Examiner cites col. 10, lines 63-67 as disclosing this element, and indicates on page 4 of the Office Action that RGK is equivalent to the AUTHU as disclosed in Faccin et al.

Faccin et al. col. 10, starting at line 32 discusses a TSK update process and reads in part as follows:

A new TSK is generated at the home domain using a new random number... and the long-term key. The new random number, RANDTSK, and the new TSK are sent to the visited domain...If successful, the serving system executes the user specific authentication procedure: **It challenges the user sending it a randomly generated number RANDU to authenticate him and make sure the User now has the correct TSK value.** The user takes RANDU and the newly derived TSK as inputs to a shared algorithm with the serving system and computes AUTHU. (Emphasis added.)

As disclosed in Faccin et al., a TSK update process may occur when the current TSK used by a user in the visited domain is changed to a new value under the direction of AAAh. (Col. 9, lines 29-30). Note the updated TSK is generated based on a new random number RANDTSK. AUTHU is generated using a randomly generated number and the updated TSK and is used to verify the user has the updated TSK value. This does not disclose an RGK value as recited in Applicants’ claim 1. For example, Applicants’ specification states:

The radio access network (RAN) 14 transmits a request for the RAK and a random number (RAND) along a path 28 to

the BM-SC 20, which in response generates the **RAK which is a function with arguments PK and RAND**. The RAK, which may be represented as $c2(PK, RAND)$, is transmitted by the BM-SC 20 to the RAN 14 along a path 30. The **RAK is a temporary, RAN specific key used to generate temporary, user-specific registration key (RGK) values** and to hide the PK from the RAN 14 which is visited by the UE 2... The **RGK is a temporary, user-specific key used to authenticate registration messages**. (Emphasis added, Applicants' specification paragraphs [1018] – [1019].)

In addition, Faccin does not disclose a multicast-broadcast-multimedia system. Col. 2, lines 4-12 of Faccin states “a need exists for a method and apparatus that allows a **user/mobile node** and a **visited network** to perform authentication and key distribution procedures...and empowers a visited network to authenticate a user at any time, as well as empowers the user to authenticate the network at any time...” This is in contrast to Applicants claimed invention of a method of obtaining secure registration by a memory module (UICC) in a multicast-broadcast-multimedia system (MBMS). Support may be found in Applicants' specification stating in part:

...a multicast-broadcast multimedia network wherein a serving network transmits the content to a single user through a dedicated channel, multicasts the content to a plurality of users through dedicated channels if the number of users demanding the service does not justify broadcasting the service to all users in the coverage area, or broadcasts the content to all users in the coverage area if the number of users demanding the service exceeds a predetermined threshold. (Applicants' specification, paragraph [0015].)

The amendment to claim 1 further provides further clarification.

Applicants submit Faccin fails to disclose all the elements of Applicants' claim 1 and thus request that the rejection of claim 1 be withdrawn.

Claims 12, 22, 31, 41 and 52 have been similarly amended. Applicants respectfully request that the rejections of claims 12, 22, 31, 41 and 52 be withdrawn as the Faccin reference does not disclose all the limitations of these claims.

Applicants further submit that claims 2-11, 13-21, 23-30, 32-40, 42-51 and 53-61 are allowable as depending directly or indirectly from an allowable base claim.

REQUEST FOR ALLOWANCE

In view of the foregoing, Applicants submit that all pending claims in the application are patentable. Accordingly, reconsideration and allowance of this application are earnestly solicited. Should any issues remain unresolved, the Examiner is encouraged to telephone the undersigned at the number provided below.

Respectfully submitted,

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